

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

**ROBIN JENNINGS HUFF**  
**a.k.a. ROBIN BELINDA JENNINGS**  
7955 Lovelady Road  
Dadeville, AL 36853

Registered Nurse License No. **564059**

Respondent

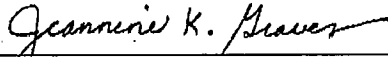
Case No. 2011-755

**DECISION AND ORDER**

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **June 14, 2011.**

IT IS SO ORDERED **June 14, 2011.**

  
\_\_\_\_\_  
President  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 KAMALA D. HARRIS  
Attorney General of California  
2 ALFREDO TERRAZAS  
Senior Assistant Attorney General  
3 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
4 State Bar No. 186131  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 445-7384  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2011-755

12 **ROBIN JENNINGS HUFF**  
13 **aka ROBIN BELINDA JENNINGS**  
14 7955 Lovelady Road  
Dadeville, AL 36853

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

15 **Registered Nurse License No. 564059**

16 Respondent.

17  
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this  
19 proceeding that the following matters are true:

20 PARTIES

21 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Executive Officer of the Board of  
22 Registered Nursing. She brought this action solely in her official capacity and is represented in  
23 this matter by Kamala D. Harris, Attorney General of the State of California, by Janice K.  
24 Lachman, Supervising Deputy Attorney General.

25 2. Robin Jennings Huff, aka Robin Belinda Jennings (Respondent) is representing  
26 herself in this proceeding and has chosen not to exercise her right to be represented by counsel.

27 ///

28 ///

1       3.     On or about February 23, 2000, the Board of Registered Nursing issued Registered  
2 Nurse License No. 564059 to Robin Jennings Huff, aka Robin Belinda Jennings (Respondent).  
3 The Registered Nurse License expired on July 31, 2009, and has not been renewed.

4                               JURISDICTION

5       4.     Accusation No. 2011-755 was filed before the Board of Registered Nursing (Board),  
6 Department of Consumer Affairs, and is currently pending against Respondent. The Accusation  
7 and all other statutorily required documents were properly served on Respondent on March 9,  
8 2011. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of  
9 Accusation No. 2011-755 is attached as Exhibit A and incorporated by reference.

10                           ADVISEMENT AND WAIVERS

11       5.     Respondent has carefully read, and understands the charges and allegations in  
12 Accusation No. 2011-755. Respondent also has carefully read, and understands the effects of this  
13 Stipulated Surrender of License and Order.

14       6.     Respondent is fully aware of her legal rights in this matter, including the right to a  
15 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at  
16 her own expense; the right to confront and cross-examine the witnesses against her; the right to  
17 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to  
18 compel the attendance of witnesses and the production of documents; the right to reconsideration  
19 and court review of an adverse decision; and all other rights accorded by the California  
20 Administrative Procedure Act and other applicable laws.

21       7.     Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
22 every right set forth above.

23                           CULPABILITY

24       8.     Respondent admits the truth of each and every charge and allegation in Accusation  
25 No. 2011-755, agrees that cause exists for discipline and hereby surrenders her Registered Nurse  
26 License No. 564059 for the Board's formal acceptance.

27       9.     Respondent understands that by signing this stipulation she enables the Board to issue  
28 an order accepting the surrender of her Registered Nurse License without further process.

CONTINGENCY

10. This stipulation shall be subject to approval by the Board of Registered Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Registered Nursing may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect. Except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 564059, issued to Respondent Robin Jennings Huff, aka Robin Belinda Jennings, is surrendered and accepted by the Board of Registered Nursing.

14. The surrender of Respondent's Registered Nurse License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent.

1 This stipulation constitutes a record of the discipline and shall become a part of Respondent's  
2 license history with the Board.

3 15. Respondent shall lose all rights and privileges as a registered nurse in California as of  
4 the effective date of the Board's Decision and Order.

5 16. Respondent shall cause to be delivered to the Board her pocket license and, if one was  
6 issued, her wall certificate on or before the effective date of the Decision and Order.

7 17. If Respondent ever files an application for licensure or a petition for reinstatement in  
8 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must  
9 comply with all the laws, regulations and procedures for reinstatement of a revoked license in  
10 effect at the time the petition is filed, and all of the charges and allegations contained in  
11 Accusation No. 2011-755 shall be deemed to be true, correct and admitted by Respondent when  
12 the Board determines whether to grant or deny the petition.

13 18. If and when Respondent's license is reinstated, she shall pay to the Board costs  
14 associated with its investigation and enforcement pursuant to Business and Professions Code  
15 section 125.3 in the amount of \$477.50. Respondent shall be permitted to pay these costs in a  
16 payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the  
17 Board from reducing the amount of cost recovery upon reinstatement of the license

18 19. If Respondent should ever apply or reapply for a new license or certification, or  
19 petition for reinstatement of a license, by any other health care licensing agency in the State of  
20 California, all of the charges and allegations contained in Accusation No. 2011-755 shall be  
21 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
22 Issues or any other proceeding seeking to deny or restrict licensure.

23 20. Respondent shall not apply for licensure or petition for reinstatement for two (2)  
24 years from the effective date of the Board of Registered Nursing's Decision and Order.

25 ///

26 2VCSV11E10  
27 11/12/11 11:10 AM

28 ///

///

1 ACCEPTANCE

2 I have carefully read the Stipulated Surrender of License and Order. I understand the  
3 stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated  
4 Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound  
5 by the Decision and Order of the Board of Registered Nursing.

6  
7 DATED: 4-6-11

Robin Jennings Huff  
8 ROBIN JENNINGS HUFF,  
9 AKA ROBIN BELINDA JENNINGS  
Respondent

10 ENDORSEMENT

11 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
12 for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

13 Dated: 4-6-11, 2011

14 4-18-2011

15 JAL

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
ALFREDO TERRAZAS  
Senior Assistant Attorney General

Janice K. Lachman  
18 JANICE K. LACHMAN  
19 Supervising Deputy Attorney General  
Attorneys for Complainant

20  
21  
22 SA2010102515  
Stipulation.rtf

23  
24  
25 2008VNM10  
26 REGISTERED NURSING  
27 BOARD

28 2011 APR 18 10:00 AM

## Exhibit A

2VC8VHEW10 Accusation No. 2011-755  
REGISTERED MAIL  
JAN 11 2012

301 24551 SEP 20

[illegible]

1 KAMALA D. HARRIS  
Attorney General of California  
2 ALFREDO TERRAZAS  
Senior Assistant Attorney General  
3 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
4 State Bar No. 186131  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 445-7384  
Facsimile: (916) 327-8643  
7 Attorneys for Complainant

8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2011-755

**ACCUSATION**

13 **ROBIN JENNINGS HUFF**  
14 **aka ROBIN BELINDA JENNINGS**  
7955 Lovelady Road  
Dadeville, AL 36853

15 **Registered Nurse License No. 564059**

16 Respondent.

17  
18 Louise R. Bailey, M.Ed. RN ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the Executive  
21 Officer of the Board of Registered Nursing ("Board"), Department of Consumer Affairs.

22 2. On or about February 23, 2000, the Board issued Registered Nurse License Number  
23 564059, to Robin Jennings Huff, also known as Robin Belinda Jennings ("Respondent"). The  
24 license was in full force and effect at all times relevant to the charges herein. The license expired  
25 on July 31, 2009, and has not been renewed.

26 ///

27 ///

28 ///

2VCSYHEWLO  
REGISTERED NURSE  
564059

SP11/05/09 SA 10/10/09



## JURISDICTION

3. Business and Professions Code ("Code") section 2750 provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Code section 2811(b), the Board may renew an expired license at any time within eight years after the expiration.

## STATUTORY PROVISIONS

5. Code section 2761 states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action."

## COST RECOVERY

6. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

///

///

///

///

2008-05-10  
RECEIVED  
NURSING BOARD

2008-05-10 11:10 AM

FIRST CAUSE FOR DISCIPLINE

(Out-of-State Discipline)

7. Respondent is subject to discipline under Code section 2761(a)(4), in that Respondent has been disciplined as follows:

A. Effective July 30, 2010, in a matter entitled *In the Matter of Registered Nurse License No. RN 114252 Issued to Robin Huff Jennings; aka Robin H. Prine; Robin Belinda Jennings*," the Arizona State Board of Nursing issued an Order adopting a Consent For Entry of Voluntary Surrender, wherein Respondent voluntarily surrendered her nursing license. A copy of the Order of Voluntary Surrender is attached hereto as **Exhibit A**. The disciplinary action was based on the following:

1. On or about June 8, 2010, the Arizona Board received two certified disciplinary documents from the Alabama Board of Nursing. The first document was entitled, "*In the Matter of Robin Jennings Huff [Respondent], License No. 1-043678, Voluntary Surrender*," attached hereto as **Exhibit B**, with an effective date of April 27, 2010. The second document was entitled, "*In the Matter of Robin Jennings Huff [Respondent] License No. 1-043678, Case No. 2009-0274, Voluntary Disciplinary Alternative Program Agreement [hereinafter "VDAP Agreement"]*", attached hereto as **Exhibit C**, with an effective date of February 11, 2009. In Respondent's VDAP Agreement she admitted to having a chemical dependency problem, acknowledged the need for treatment, and agreed to be monitored by VDAP for a period of 60 months. The Arizona Board initiated an investigation, after which Respondent voluntarily surrendered her license.

B. Effective April 27, 2010, in a case entitled *In the Matter of Robin Jennings Huff, License No.: 1-043678*, the Alabama Board of Nursing approved and accepted the Voluntary Surrender of Respondent's license to practice registered nursing in Alabama. The voluntary surrender is considered to have the same effect as revocation of the license. Respondent had entered into a Voluntary Disciplinary Alternative Program Agreement in lieu of proceeding with traditional disciplinary action on February 11, 2009, following her admission that she had a problem with chemical dependency and that she needed treatment. Subsequently,

1 on April 23, 2010, Respondent executed a Voluntary Surrender of her nursing license, which was  
2 accepted by the Alabama Board on April 27, 2010.

3 PRAYER

4 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
5 and that following the hearing, the Board of Registered Nursing issue a decision:

6 1. Revoking or suspending Registered Nurse License Number 564059, issued to Robin  
7 Jennings Huff, also known as Robin Belinda Jennings;

8 2. Ordering Robin Jennings Huff, also known as Robin Belinda Jennings, to pay the  
9 Board of Registered Nursing the reasonable costs of the investigation and enforcement of this  
10 case, pursuant to Business and Professions Code section 125.3; and,

11 3. Taking such other and further action as deemed necessary and proper.

12 DATED: 3/9/11

13 *Louise R. Bailey*  
14 LOUISE R. BAILEY, M.ED., RN

15 Executive Officer  
16 Board of Registered Nursing  
17 Department of Consumer Affairs  
18 State of California  
19 Complainant

20 SA2010102515  
21 10657503.doc

22 2VCHYHEW10  
23 RECEIVED NURSING  
24 BOARD

25 2010 MAR 10 10:10

Exhibit A  
Consent for Entry of Voluntary Surrender Order No. 1006009

2VCKVHEM10  
REC'D LKTH 10/3/12  
NOTICE

SPRINGER SA 10/10/12

10/10/12

ARIZONA STATE BOARD OF NURSING  
4747 North 7th Street, Suite 200  
Phoenix, Arizona 85014-3655  
602-771-7800

IN THE MATTER OF REGISTERED  
NURSE LICENSE NO. RN114252  
ISSUED TO:

ROBIN HUFF JENNINGS; AKA ROBIN H.  
PRINE; ROBIN BELINDA JENNINGS  
RESPONDENT

CONSENT FOR ENTRY OF  
VOLUNTARY SURRENDER  
ORDER NO. 1006009

A complaint charging ROBIN HUFF JENNINGS; AKA ROBIN H. PRINE; ROBIN BELINDA JENNINGS ("Respondent") with violation of the Nurse Practice Act has been received by the Arizona State Board of Nursing ("Board"). In the interest of a prompt and speedy settlement of the above-captioned matter, consistent with the public interest, statutory requirements, and the responsibilities of the Board, and pursuant to A.R.S. § 32-1605.01(D), Respondent voluntarily surrenders her license for a minimum of five years.

Based on the evidence before it, the Board makes the following Findings of Fact, Conclusions of Law:

FINDINGS OF FACT

1. Respondent holds Board issued registered nurse license no. RN114252, which expired on June 30, 2009. Pursuant to A.R.S. § 32-1664 (C), the board retains jurisdiction to proceed with an investigation or a disciplinary proceeding against a regulated party who license or certificate expired not more than five years before the board initiates the investigation.

2. On or about June 8, 2010, the Board received two certified disciplinary documents from the Alabama Board of Nursing the first was entitled "In the Matter of Robin Jennings Huff [Respondent] License No. 1-043678, Voluntary Surrender" with an effective date of April 27, 2010. The second document was entitled, "In the Matter of Robin Jennings Huff [Respondent] License No. 1-

2009-06-30  
REGISTERED NURSE  
602-771-7800

1-043678

043678, Case No. 2009-0274, Voluntary Disciplinary Alternative Program Agreement [hereinafter "VDAP Agreement"] with an effective date of February 11, 2009. In Respondent's VDAP Agreement she admitted having a chemical dependency problem, acknowledged the need for treatment and would be monitored by VDAP for a period of 60 months. On or about December 22, 2008, Respondent entered into an outpatient treatment program in Birmingham, Alabama. Based upon this information the Board initiated an investigation.

3. On or about June 29, 2010, the Board sent Respondent notification of the complaint and the opportunity to voluntarily surrender her Arizona registered nurse license.

4. On or about July 9, 2010, Respondent requested to voluntarily surrender her license.

////

////

////

////

////

////

////

////

////

////

////

////

////

////

2009-0274  
RECEIVED BOARD  
JUL 10 2010

SECRETARY'S OFFICE

### CONCLUSIONS OF LAW

Pursuant to A.R.S. §§ 32-1606, 32-1663, and 32-1664, the Board has subject matter and personal jurisdiction in this matter.

The conduct and circumstances described in the Findings of Fact constitute a violation of A.R.S. § 32-1601(d) (Any conduct or practice that is or might be harmful or dangerous to the health of a patient or the public) (effective October 18, 2009); (f) (Having a license, certificated, permit or registration to practice a health care profession denied, suspended, conditioned, limited or revoked in another jurisdiction and not reinstated by that jurisdiction) (effective October 18, 2009); and (j) (Violating a rule that is adopted by the board pursuant to this chapter) effective October 18, 2009), specifically:

- A.A.C. R4-19-403(B) (17) (A pattern of being under the influence of alcohol, drugs, or a similar substance to the extent that judgment may be impaired and nursing practice detrimentally affected, or while on duty in any health care facility, school, institution or other work location at which the nurse practices) (effective November 12, 2005); and
- A.A.C. R4-19-403(B), (31) (Practicing in any other manner that give the Board reasonable cause to believe the health of a patient or the public may be harmed) (effective November 12, 2005).

The conduct and circumstances described in the Findings of Fact constitute sufficient cause pursuant to A.R.S. §§ 32-1605.01(D) and 32-1664(N) to take disciplinary action against Respondent's license to practice as a registered nurse in the State of Arizona.

Respondent admits the Board's Findings of Fact, Conclusions of Law.

Respondent understands that she has an opportunity to request a hearing and declines to do so.

270834810  
RECEIVED  
2011 05 10

2011 05 10 10:10

Respondent agrees to issuance of the attached Order and waives all rights to a hearing, rehearing, appeal, or judicial review relating to this Order.

Respondent understands that all investigative materials prepared or received by the Board concerning these violations and all notices and pleadings relating thereto may be retained in the Board's file concerning this matter.

Respondent understands that the admissions in the Findings of Fact are conclusive evidence of a violation of the Nurse Practice Act and may be used for purposes of determining sanctions in any future disciplinary matter.

Respondent understands the right to consult legal counsel prior to entering into the Consent Agreement and such consultation has either been obtained or is waived.

Respondent understands that this voluntary surrender is effective upon its acceptance by the Executive Director or the Board and by Respondent as evidenced by the respective signatures thereto. Respondent's signature obtained via facsimile shall have the same effect as an original signature. Once signed by Respondent, the agreement cannot be withdrawn without the Executive Director or the Board's approval or by stipulation between Respondent and the Executive Director or the Board. The effective date of this Order is the date the Voluntary Surrender is signed by the Executive Director or the Board and by Respondent. If the Voluntary Surrender is signed on a different date, the later date is the effective date.

Respondent understands that Voluntary Surrender constitutes disciplinary action. Respondent also understands that she may not reapply for re-issuance during the period of Voluntary Surrender.

Respondent agrees that she may apply for re-issuance after the period of voluntary surrender under the following conditions, and must comply with current law at the time of their application for re-issuance:

2VCEVHEH10  
RECEIVED NRS  
JUN 10 2006

NON-RECEIVED  
JUN 10 2006



The application for re-issuance must be in writing and shall contain therein or have attached thereto substantial evidence that the basis for the voluntary surrender has been removed and that the re-issuance of the license does not constitute a threat to the public's health, safety and welfare. The Board may require physical, psychological, or psychiatric evaluations, reports and affidavits regarding Respondent as it deems necessary. These conditions shall be met before the application for re-issuance is considered.

RECEIVED  
10 JUL 21 PM 1:04

SEAL

Robin L. Huff  
Respondent

Date: 7/9/10

ARIZONA STATE BOARD OF NURSING

Joey Ridenour R.N. M.N. F.A.A.N.

Joey Ridenour, R.N., M.N., F.A.A.N.  
Executive Director

Dated: July 30, 2010

RAPPOPORT/HUFF,JENNINGS.R./RN114252

**ORDER**

Pursuant to A.R.S. § 32-1605.01(D)(5) the Board hereby accepts the Voluntary Surrender of registered nurse license number RN114252, issued to ROBIN JENNINGS HUFF; AKA ROBIN H. PRINE; ROBIN BELINDA JENNINGS. This Order of Voluntary Surrender hereby entered shall be filed with the Board and shall be made public upon the effective date of this Consent Agreement. Respondent shall not practice in Arizona under the privilege of a multistate license.

IT IS FURTHER ORDERED that Respondent may apply for re-issuance of said license after a

RECEIVED  
2010 JUL 21 PM 1:04

2010 JUL 21 PM 1:04

period of five years.

SEAL

ARIZONA STATE BOARD OF NURSING

*Joey Ridenour R.N. M.N. F.A.A.N.*

Joey Ridenour, R.N., M.N., F.A.A.N.  
Executive Director

Dated: *July 30, 2010*

JR/mer/ts

COPY mailed this 30<sup>th</sup> day of JULY, 2010, by First Class Mail to:

ROBIN JENNINGS HUFF  
7955 LOVELADY ROAD  
DADEVILLE, AL 36853

By:

*Mary E. Rappoport, RN, MN*  
Mary E. Rappoport, RN, MN  
Nurse Practice Consultant

24087HEM10  
REGISTERED NURSING  
JULY 30 2010

JUL 30 2010

Exhibit B

2706470000 Voluntary Surrender  
REGISTERED HOSCHING  
LOVEDOL

CHITLYA 7-10-10

10-10-10

BEFORE THE ALABAMA BOARD OF NURSING

IN THE MATTER OF:

ROBIN JENNINGS HUFF

LICENSE NO.: 1-043678

VOLUNTARY SURRENDER

The undersigned holder of licensure to practice nursing in the State of Alabama, pursuant to § 610-X-8-.05(4) of the Alabama Board of Nursing Administrative Code hereby freely, knowingly and voluntarily surrenders said license to the Alabama Board of Nursing. I further understand that this surrender shall have the same effect as a revocation of my license, and I knowingly forfeit and relinquish all right, title and privilege of practicing nursing in the State of Alabama, unless and until such time as my license may be reinstated.

I understand that I have a right to a hearing in this matter, and I hereby freely, knowingly and voluntarily waive such right. I also understand that should any request for reinstatement be entertained by the Alabama Board of Nursing, the Alabama Board of Nursing shall have access to the entire investigative file in this matter.

I further acknowledge that the only promises or representations made to me by the Alabama Board of Nursing or its representatives are that upon receipt of proper proof and evidence of my rehabilitation, the Alabama Board of Nursing will give due consideration to an application for reinstatement of license at such time as is allowed by law. I fully understand that as a condition for reinstatement, I must demonstrate to the satisfaction of the Alabama Board of Nursing that I am capable of safely and competently resuming the practice of nursing in accordance with the laws of the State of Alabama.

This voluntary surrender shall become effective immediately upon acceptance thereof by the Alabama Board of Nursing. I understand that this document will be considered to be a public record entered as the final disposition of disciplinary proceedings presently pending against me, that this action shall be considered to be and may be recorded as a Final Order of the Board, and that this action will be reported as a disciplinary action to the Healthcare Integrity Protection Databank and the National Council of State Boards of Nursing.

EXECUTED this the 23 day of April 2010.

Charley Simpson exp. 01/13/11  
Notary Public

Robin Jennings Huff  
ROBIN JENNINGS HUFF

APPROVED AND ACCEPTED by the ALABAMA BOARD OF NURSING on this the 23<sup>27<sup>th</sup></sup> day of

April 2010

ALABAMA BOARD OF NURSING

N. Genell Lee  
N. GENELL LEE, RN, MSN, JD  
EXECUTIVE OFFICER

2008 APR 10  
RECEIVED  
BOARD

COMMUNICATIONS

RECEIVED

2VCHVHEMLLO  
Exhibit C  
\* Voluntary Disciplinary Alternative Program Agreement

DO NOT SIGN HERE

DATE

VOLUNTARY DISCIPLINARY ALTERNATIVE PROGRAM AGREEMENT

THE ALABAMA BOARD OF NURSING

IN THE MATTER OF:

ROBIN JENNINGS HUFF

LICENSE NO. 1-043678

CASE NO. 2009-0274

)  
)  
) VOLUNTARY DISCIPLINARY  
) ALTERNATIVE PROGRAM AGREEMENT  
)  
)

The Alabama Board of Nursing, hereinafter referred to as Board, having evidence that ROBIN JENNINGS HUFF, hereinafter referred to as Respondent, is in violation of the Code of Alabama 1975, §34-21-25, and of the Alabama Board of Nursing Administrative Code, §610-X-8-.03; hereby enters into this agreement with the Respondent in lieu of proceeding with traditional disciplinary action. Respondent understands the right to a formal hearing in this matter and hereby knowingly waives such right. Respondent further understands and agrees that this is a non-appealable Order.

FINDINGS OF FACT

I.

On April 4, 1983, Respondent was licensed by the Alabama Board of Nursing as a Registered Nurse (RN) and was so licensed at all times relevant to matters stated herein.

Respondent is also licensed as a Registered Nurse (RN) in the States of Arizona (RN 114252, expires June 30, 2009), California (RN 564059, expires July 31, 2009), Colorado (RN 124689, expired September 30, 2007), Florida (RN 2096642, expires April 30, 2010), Georgia (RN 143946, expires January 31, 2010), Massachusetts (RN 240823, expires June 21, 2010), Montana (RN 26607, expired December 31, 2002), New Jersey (RN 26NR10055000, expired May 31, 2002), Rhode Island (RN 37457, expired March 1, 2006), Utah (RN 4843607-3105, expired January 31, 2005), and Wisconsin (RN 136571, expired February 29, 2004).

II.

The Respondent has admitted chemical dependency and has acknowledged the need for treatment. On December 22, 2008, the Respondent entered outpatient treatment at Alabama Psychiatric Services, Birmingham, Alabama, a Board-approved treatment provider.

CONCLUSIONS OF LAW

The conduct stated above constitutes sufficient grounds for the imposition of sanctions against Respondent's license to practice nursing in the State of Alabama pursuant to the Code of Alabama 1975, § 34-21-25, and the Alabama Board of Nursing Administrative Code, § 610-X-8-.03. The Alabama Board of Nursing has the authority to enter into and enforce this Agreement pursuant to the Code of Alabama 1975, § 34-21-25(j) and the Alabama Board of Nursing Administrative Code § 610-X-13.

ORDER

The Respondent, holder of Alabama License Number, (1-043678), agrees and acknowledges that continued licensure is contingent upon compliance with the terms of this Agreement and that failure to adhere to said terms is cause for discharge from this program and grounds for disciplinary action by the Board. The terms of this Agreement are as follows:

1. Duration of Agreement

Respondent acknowledges that the duration of this Agreement is for a period of sixty (60) months unless extended pursuant to stipulation 3 below. Respondent may apply for early release after thirty-six (36) months of satisfactory compliance with all the stipulations of this agreement. If Respondent applies for early release, a comprehensive chemical dependency, physical and mental evaluation from a treatment provider with a healthcare professionals tract which supports early release shall be submitted to the Board. Said evaluation must be performed within the ninety (90) day period immediately prior to submission of the application for early release.

RECEIVED

NOV 11 2012

RECEIVED

2. Monitoring Fee

Respondent shall pay a monitoring fee in the amount of \$1,000.00. This fee must be paid within thirty (30) days of the documented date of release from treatment or within thirty (30) days of the signing of this Agreement, whichever comes later. Respondent understands that failure to pay the fee is cause for discharge from this program and disciplinary action by the Board of Nursing.

3. Evaluations

Within thirty (30) days of the effective date of this Agreement, Respondent must submit the results of required comprehensive evaluations for chemical dependency, physical and mental illness from a Board recognized treatment provider with Board consultation with the evaluating professional prior to making the assessment. Respondent must abide by any requests and recommendations from the provider that may include in-patient evaluation, outpatient evaluation, partial hospitalization evaluation and psychological testing. Should Respondent, for any reason, fail to comply with this stipulation, such will be grounds for discharge from this program and disciplinary action. Respondent cannot be employed as a nurse during the evaluation process.

Respondent is also required to undergo subsequent evaluations by recognized provider with a health care professionals tract should such be requested by the Board following a relapse or for other cause. Respondent must follow all treatment recommendations from the provider including in-patient treatment, out-patient treatment, half-way house, residential long term treatment, counseling, etc.

Prior to successful completion of VDAP, the Respondent shall return to the original treatment provider or other Board-approved provider for required comprehensive evaluations, and a determination of readiness to practice without supervision and/or monitoring. Said evaluation must be performed within the ninety-(90) day period immediately



prior to the scheduled termination of this Agreement. Based upon the evaluation, the Board may extend the period of this Agreement and require additional treatment, counseling, etc.

4. Treatment Program

The program must be a Board recognized chemical dependency treatment program. Respondent shall cause the director of the treatment program to submit to the Board proof of Respondent's entry into a primary intensive alcohol/drug treatment program in accordance with the recommendations made during the evaluation process which may include in-patient treatment, out-patient treatment, half-way house, residential long term treatment and/or a combination thereof. Respondent shall also cause the program director to provide the Board with documentation concerning Respondent's successful completion of the program and recommendations and arrangements for appropriate follow-up. Should Respondent, for any reason, fail to comply with this stipulation, such will be grounds for discharge from this program and disciplinary action. Respondent cannot be employed as a licensed nurse until completion of the initial phase of the treatment program and then may only do so upon satisfaction of all recommendations from the provider and documentation by said provider of readiness to return to professional employment and ability to provide safe nursing practice.

5. Aftercare Program

Unless otherwise recommended by the treatment provider and approved by the Board, the Respondent, within one (1) week of the completion of the initial phase of the treatment program, shall enter a Board acceptable chemical dependency aftercare program with said program to meet on a weekly basis and to extend for a minimum of one (1) year. Respondent shall also cause the program to submit to the Board, in writing, and on the Board-approved form, documentation of the Respondent's attendance, participation and progress in the program. Such reports are due quarterly, according to schedule, for the remainder of the monitoring period or until successful completion of the aftercare program. In the event the Respondent is discharged

RECEIVED  
JAN 10 1984  
JAN 10 1984

from the aftercare program for noncompliance, the Respondent and the program are to immediately notify the Board, in writing, of such occurrence. This is required regardless of whether Respondent is employed in nursing.

6. Individual/Group Counseling

Respondent shall participate regularly in a Board-acceptable counseling program contingent upon the recommendations of the original treatment program. Respondent shall continue in counseling for as long as deemed necessary by the counselor/therapist. This stipulation is in addition to meeting the stipulation requiring aftercare participation. Respondent shall have the counselor/therapist notify the Board when continued counseling is no longer indicated and Respondent is discharged or when there is a failure to complete or comply with the course of therapy. Respondent shall also cause the program to submit to the Board, in writing and on the Board-approved form, evidence of satisfactory participation and progress in counseling. Such reports are due quarterly, according to schedule, as long as indicated during the period of this Agreement. This is required regardless of whether Respondent is employed in nursing.

7. Twelve Step Meetings

Respondent shall attend and participate in a minimum of three Twelve-Step meetings per week for the duration of this Agreement. The Respondent shall submit Meeting Attendance Verification Sheets monthly, according to schedule, on the Board-approved form, for the remainder of the Agreement period. It is required that Respondent have a Sponsor during the period of this Agreement. The Board should be provided sufficient information as how to contact this individual. This is required regardless of whether Respondent is employed in nursing.

8. Self Report

Respondent shall submit a written status report to the Board on a Board-approved form. This is to be submitted on a monthly basis, according to schedule, must contain a self-assessment of current status. This report is required regardless of whether Respondent is

employed in nursing.

9. Primary Physician – Drug Use Exception

The Respondent will have only one primary physician/group during the period of this agreement. The primary physician must refer to any other physician, except in a documented emergency. All mood altering medications or medications containing a mood-altering substance must be prescribed to Respondent by this primary physician for a bona fide medical condition, or if prescribed by the referred physician, must be immediately reported in writing by the Respondent to the primary physician with a copy to the Board. Respondent must notify the Board of the name, address, and telephone number of the primary physician within 10 days of the effective date of this Agreement and within ten (10) days in the case of a new physician. Respondent shall cause any and all prescriptions to be verified to the Board by the prescribing practitioner on a Board provided form at the time of the issuance of a prescription and must also provide verification of all medications prescribed prior to the Respondent's entry into this Agreement. No prescription over twelve (12) months old should be taken without an updated prescription verification. The Board or its designee may, at any time, request the practitioner to document the continued need for prescribed medications. Respondent shall keep a written record of medications taken, including over-the-counter drugs, and produce such record upon request by the Board. This is required regardless of whether Respondent is employed in nursing.

10. Dentist – Drug Use Exception

The Respondent will have only one dentist during the period of this agreement. The primary dentist must refer to any other dentist or dental specialist, except in a documented emergency. All mood altering medications or medications containing a mood altering substance must be prescribed to Respondent by this primary dentist for a bona fide dental condition, or if prescribed by a referred dentist, must be immediately reported in writing by the Respondent to the primary dentist with a copy to the Board. Respondent must notify the Board of the name, address, and

RECEIVED  
JAN 12 1999  
JAN 12 1999

JAN 12 1999

JAN 12 1999

telephone number of the primary dentist within ten (10) days of the effective date of this Agreement, and within ten days in the case of a new dentist. Respondent shall cause any and all prescriptions to be verified to the Board by the prescribing dentist on a Board provided form at the time of the issuance of a prescription and must also provide verification of all medications prescribed prior to the Respondent's entry into this Agreement. No prescription over twelve (12) months old should be taken without an updated prescription verification. The Board or its designee may, at any time, request the practitioner to document the continued need for prescribed medications. Respondent shall keep a written record of medications taken, including over-the-counter drugs, and produce such record upon request by the Board. This is required regardless of whether Respondent is employed in nursing.

11. Abstain from Alcohol Use

Respondent shall abstain completely from the use of any substance containing alcohol.

12. Abstain from Drug Use

Respondent shall abstain completely from the nonprescribed use or possession of controlled substances as defined in the Alabama Uniform Controlled Substances Act, illegal drugs as defined by law, mood altering substances, or any drugs requiring a prescription (legend) except as provided for in this agreement.

13. Drug Screening

Respondent shall participate as directed in a Board-acceptable program for random biological drug testing. The drug screen will be a Board-approved drug screen and may include additional chemicals as designated by the Board or its designee. A minimum of one (1) random testing per month shall be done and may be required more frequently as requested by the Board or its designee. Further, the Board or its designee may at anytime require the Respondent to undergo additional drug screening of a type specified by the Board, including hair testing, to ensure that the Respondent is free of chemical substances. Refusal to provide a specimen

RECEIVED  
ALABAMA BOARD OF NURSING  
JAN 10 2010

RECEIVED  
ALABAMA BOARD OF NURSING  
JAN 10 2010

RECEIVED  
ALABAMA BOARD OF NURSING  
JAN 10 2010

suitable for testing within the requested time frame constitutes a violation of this Agreement and such will be cause for dismissal from this program and grounds for disciplinary action. Respondent waives any argument as to chain-of-custody of the sample or validity/accuracy of its testing regarding any positive screen received by the Board from an approved testing facility. The report of a positive drug screen which is not a result of documented, prescribed medications as provided for herein shall be considered a violation of this Agreement. This is required regardless of whether Respondent is employed in nursing.

14. Employment - Monitoring

Respondent shall practice only under the on-site monitoring of a Board-approved licensed health professional in good standing with their professional regulatory body. The employment monitor is not required to be on the same unit or ward as Respondent, but should be on site and readily available to provide assistance and intervention in the event the Respondent appears impaired or otherwise unable to safely practice. The Respondent shall work only regularly assigned, identified, and predetermined units. The on-site monitor shall be primarily one (1) person. The Respondent shall not be self-employed or contract for services.

15. Employment-Increased Autonomy

Following two (2) years of satisfactory compliance with stipulations, Respondent may request to work areas which have limited supervision. If such is granted, said employment will be with specified conditions as set forth by the Board. In no event may Respondent engage in unsupervised practice without written authorization from the Board.

16. Restricted Employment

Respondent shall not work for a nursing registry, traveling nurse agency, nursing float pool, hospice, home health agency, or temporary employment agency without prior written approval from the Board or its designee.

27 APR 1990  
RECEIVED  
NURSING BOARD  
ST. LOUIS, MO

17. Employment-Supervision Restriction

Respondent shall not be employed as a supervising nurse.

18. Employment - Access to Drugs

Respondent shall not administer or have access to controlled substance medications for a minimum of six (6) months of employment, and shall not have access to or administer controlled substance medications until written permission is received from the Board stating this stipulation no longer applies. Respondent shall work in nursing a minimum of six (6) months without this restriction prior to completing the agreement.

19. Employment - Hours of Practice

Respondent shall not work more than eighty (80) hours in a two- (2) week period.

20. Employment - Notification of Participation

Respondent shall provide any health care employers, collaborative and covering physicians (if CRNP/CNM) and/or school of nursing with a copy of this Agreement and cause each to acknowledge to the Board, in writing, that a copy of the Agreement has been provided to them. Said notification shall be received by the Board no later than ten (10) days after the effective date of this Agreement or within ten (10) days of Respondent's employment or advanced practice approval or entry into school and must be on the Board-provided form.

21. Employment - Change in Status

Respondent shall not accept or change employment without prior written notification to the Board. Said notification must include the name and number of the person who will be Respondent's supervisor for the period of this Agreement.

22. Employment - Evaluation of Performance

Respondent shall cause the employer to provide the Board, on a Board-approved form, a written evaluation of Respondent's nursing performance. Such reports are due quarterly, according to schedule. The receipt of an unfavorable report may be considered to be a violation

of this Agreement. If Respondent is not employed as a nurse, Respondent is required to inform the Board of employment status in the monthly self-report.

23. Not Employed in Nursing

In order to complete the terms of this Agreement, the Respondent must have been employed as a practicing nurse for a minimum period of eighteen (18) months. During periods of employment in fields other than nursing, Respondent is not relieved from compliance with all other terms and conditions of this Agreement.

24. Alabama Licensure Status

Respondent must maintain a current license at all times during the period of this Agreement. If for any reason Respondent allows the nursing license to lapse/expire, such may be cause for dismissal from the program and grounds for disciplinary action.

25. Notification of Board

If Respondent is arrested by any law-enforcement agency or is admitted as a patient to any institution in this state or elsewhere for treatment regarding the abuse of or dependence on any chemical substance, or for treatment for any emotional or psychological disorder, Respondent shall cause the Board to be notified immediately. Respondent also shall immediately report to the Board any relapse as well as any disciplinary action issued by an employer. Should Respondent test positive on any drug screen conducted by an employer, an employee assistance program, court referral program or other entity, the Respondent shall immediately report such to the Board.

26. Change of Address

Respondent shall immediately notify the Board, in writing, of any change of address.

27. Relocation

The Respondent must notify the Board of pending relocation outside the State of Alabama. If Respondent plans to relocate to another state, Respondent must request permission of the Alabama Board to apply to the other state's monitoring program. If permission is granted, the

Respondent must inform the Board of Nursing in that state and apply to that state's monitoring program. If accepted into the monitoring program of another state, Respondent must successfully complete that program in order to fulfill the terms of this Agreement. Respondent must submit to the Board a copy of the Agreement from the other state and official notification of successful completion or unsuccessful termination thereof. In the event Respondent is not approved to apply to the other state's program or is not accepted into that program or there is no such program in the other state, it is agreed that Respondent's Alabama license will be placed on a probationary status and will comply with the terms and conditions of that Order. The Board retains the right to withdraw approval for out-of-state monitoring if circumstances indicate that such is appropriate.

In the event Respondent relocates to another country, Respondent must abide by recommendations of the Board as to continued participation in the program.

28. Personal Interview

Respondent shall appear in person for interviews at the request of the Board or Board designee.

29. Obey the Laws

Respondent shall refrain from violation of any federal, state or local law or rule or Order of the Board. A felony conviction on any criminal charge pending at the time of the signing of this Agreement will result in discharge from the program and is grounds for disciplinary action. Any arrest subsequent to the signing of this Agreement not based upon facts disclosed at the time of the signing will result in discharge from the program and may be grounds for disciplinary action.

30. Release of Records and Information

Respondent hereby authorizes the Board of Nursing to submit information and all records necessary to ensure compliance with the stipulations of this Agreement and public safety. This includes communication with Respondent's employer (existing and prospective) and members of Respondent's treatment team regarding non-compliance and/or possible relapse. Respondent



also agrees to execute all appropriate release of information forms so as to allow all treatment providers, healthcare providers, employers and all other necessary persons to inform the Board, in writing, of Respondent's status and progress.

31. Violation

Any deviation from the requirements of this Agreement without the written consent of the Board shall constitute a violation of this Agreement and will be cause for discharge from the program and grounds for disciplinary action.

32. Subsequent Practice Act Violation

Should supplemental cause for disciplinary action arise during the period of this Agreement such is cause for discharge from the program and grounds for disciplinary action.

33. Fraudulent Acts During Period of Agreement

Submission of fraudulent documents or reports or misrepresentation of facts relating to the terms and conditions stated herein shall constitute a violation of this Agreement.

34. Termination of Agreement

This Agreement shall terminate only upon receipt of documents to satisfy all terms and conditions and the Respondent is notified in writing of successful completion thereof. This period of monitoring will not terminate until notification by the Board to Respondent in writing that all terms and conditions of the Agreement have been met.

35. Public Information

This Agreement and Respondent's records are public information up until Respondent's successful completion of this Agreement. Upon successful completion, Respondent's records are not subject to public disclosure. All disciplinary actions of the Board will be reported to all required data banks.

2000000000  
RECEIVED

2000000000


36. Effective Date

The effective date of this Agreement shall be the date of Respondent's acceptance into the program as denoted by the signature of the program director.

EXECUTED on this the 11 day of FEBRUARY 2009.

  
ROBIN JENNINGS HUFF

APPROVED AND ACCEPTED by the ALABAMA BOARD OF NURSING on this the 11th day of February 2009.

  
N. GENELL LEE, RN, MSN, JD  
EXECUTIVE OFFICER  
ALABAMA BOARD OF NURSING

Rev. 11/04

2009 FEB 10  
REGISTERED NURSING  
BOARD

2009 FEB 10

2009 FEB 10